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Federal Communications Commission
425 12th Street, SW
Washington, DC 20065

Re: Proceeding 06-119 - Impact of Katrina on Communications Systems

To the Commission:

Emergency Communications is something that is crucial to plan for during a disaster. Some of the reports that emergency management heard during Katrina disaster made most wonder "Did they even plan?". Without sufficient backup communications structure, governments should expect major shortfalls in operations continuity.

The years I have spent in the communications field have been spent in the emergency and disaster communications field. My job is specifically to prepare for communication shortfalls in a disaster. Much of our backup communication for the State of Delaware comes from newer technologies such as satellite phones but we also plan to use basic forms of communication such as Amateur Radio to support our mission.

Communication Corps is a new program in the state that coordinates the efforts of all volunteer emergency communication organizations in the state. The following organizations are members of Communication Corps.

- *Amateur Radio Emergency Service
- *Radio Amateur Civil Emergency Service
- *Military Affiliate Radio System
- *Civil Air Patrol Communications
- *Salvation Army Team Emergency Radio Network

Each of these groups have specific customers, but all work to achieve the same goal. To provide emergency communications using radio technologies during a disaster. The Communication Corps program is under the Department of Homeland Security Citizen Corps program which specifically targets volunteering in a disaster. Communication Corps is a great fit in that group. Not only does Communication Corps coordinate these volunteer communication efforts, but it works with emergency management to coordinate interoperability during a disaster. Using interoperability equipment such as the Raytheon JPS ACU-1000, Communication Corps provides radio patching service between a variety of frequencies and modes.

The Communication Corps program is a new initiative in Delaware with hopes that it will soon spread across the rest of the nation. Communication Corps works with an assortment of federal, state, and local agencies to provide backup communications. Just some of our customers include the Delaware Emergency Management Agency, Delaware National Guard, Delaware Division of Health and Social Services, Delaware State Police, Federal Emergency Management Agency, Department of Defense, American Red Cross, and the Salvation Army. All of these agencies will need back up communications in the event that the State of Delaware 800Mhz system fails or

becomes overloaded.

The Amateur Radio Service has a large number of benefits in a backup communication plan. First, amateur radio operators are trained professionals at their hobby. They are not only trained in electronic and radio technology, but also as trained message handlers and tactical communicators. They know how to pick up the pieces when all else fails.

Amateur Radio also has a variety of different modes and frequencies to support its mission. The service has frequencies from 1.8MHz all the way to 300Ghz as well as modes like FM, SSB, AM, CW, Packet, Pactor, PSK31, and much more. These technologies can support slow scan television, radio-based e-mail, tactical voice, and anything else that emergency managers need to communicate.

The most impressive thing the most note about amateur radio is their passion to serve the community. Amateur operators spend their own time and money to support a backup communication infrastructure. Just this should be an alert to the governing bodies to work with these professionals to make their jobs easier.

I ask the Commission to look into the three following issues:

1. Coordination of volunteer communication assets.

These assets and operators need to be credentialed and trained, all with NIMS compliant standards. Establishing the Citizen Corps Communication Corps Program as the coordinator for these issues sets a nationwide standard on who makes this coordination. At this time, Amateur Radio operators can get a variety of training from FEMA, the American Radio Relay League, as well as a plethora of emergency communication upstarts. These upstarts are making training credentials in this service harder to control and manage. In mutual aid situations like Katrina, amateur radio operators from all walks of earth showed up graciously to help, but all with no credentials, and no standardized training. How can anyone prove that they are capable to provide such services without a credentialing program?

2. Band use planning by bandwidth.

While not specifically noted in the NPRM, band use planning should be by bandwidth, not by mode. The ability to send messages in a standardized e-mail format using modern day modes such as Pactor I, II, and III on HF is much more efficient then other modes in operation. Having the ability to use radio based e-mail technology supports emergency management agencies and other customers during events like Katrina. These modes were used during the Katrina disaster but were limited due to band use regulations. Having additional bandwidth areas will allow automated digital systems like these to operate.

3. Allowing Amateur Service operators on Federal interoperability frequencies credentialed federally through the DHS Citizen Corps program.

Many federal agencies across the nation are not utilizing the NTIA Incident Response Operation frequencies noted on page 4-202 in the NTIA Redbook. In Delaware, one of the Communication Corps member programs, Military Affiliate Radio System has approval for those frequencies. According to the Redbook, stations requesting access to these frequencies must be governmental organizations. The amateur service is not managed by the same rules as users of these NTIA frequencies as it would be up to the FCC to allow a federal sponsor for the Amateur Service. Once again, the Communication Corps program at the DHS Citizen Corps level is a perfect fit to license qualified operators to use these interoperability frequencies.

Whether or not the Federal Government decides to take amateur radio and its abundance of resources for granted, emergency communications across this nation need to be properly planned for in advance. The State of Delaware will plan and execute through its Communication Corps Program the use of Amateur Radio operators as a viable and efficient mode of emergency communications.

Respectfully Submitted,

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